

Please Reject Disposal Injection Well Permit PAS2D702BALL

Non-responsive based on revised scope
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To: R3 UIC Mailbo R3 UIC Mailbo @epa.gov

Subject: Please Reject Disposal Injection Well Permit PAS2D702BALL

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Please deny the proposed permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application.

A condition of permit PAS2D701BALL for the co-located Sedat #3A commercial disposal injection well is "the permittee shall not allow the underground injection activity, otherwise authorized by this permit, to cause or contribute to the movement of fluid containing any contaminant into any underground source(s) of drinking water ("USDW"), if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 C.F.R. Part 141 or if it may otherwise adversely affect the health of persons." During the last known file review of the Sedat #3A injection well conducted by the Pennsylvania Department of Environmental Protection (DEP) on July 22, 2021, it was found that the "Well operator failed to notify the Department within 24 hours of receiving notification from a landowner, water purveyor, or affected person that a water supply has been affected by pollution or diminution." Since that file review, there have been no subsequent file reviews or inspections at this site. DEP is clearly not equipped to adequately monitor the condition of disposal injection wells, which surely require more than a yearly inspection. The related Sedat 1A monitoring well has not been inspected since November 11, 2020 which will be discussed later in this comment.

Additionally, immediately after receiving a disposal injection well permit from EPA and DEP, DEP issued five violations to Penneco Environmental Solutions for poor construction practices at the Sedat #3A well on August 12, 2020 that could easily contribute to the failure of the well to contain contaminant

Both sets of violations can be found here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3224342

http://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3067473

Given these violations, Penneco Environmental Solutions has not met the conditions of its existing disposal injection well permit for Sedat #3A and should therefore not be granted an additional permit for another disposal injection well permit at the same location, designated as Sedat #4A.

Additionally, the proposed disposal injection well permit for Sedat #4A reads, "The Permittee shall also monitor and record, quarterly, the fluid level from the Penneco Environmental Solution Sedat #2A well (API #37003-21222) located in the ¼ mile radius Area of Review used to determine where corrective action, if any, must occur to prevent contamination of USDW from this the Injection Well, and which shall serve as a monitoring well for this Injection Well. The Permittee shall compile this monitoring data and include it in the Annual Report referenced in Paragraph II.D.9. of this Permit." However, DEP has not yet granted the transfer of use permit for the Sedat #2A well. It is still classified as an extraction well. It is premature for the EPA and DEP to consider a future use of this well as a monitoring well, prior to its permitting as such.

The current undetermined status of Penneco's application to transfer the use of the Sedat #2A well can be seen here:

http://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleAuth.aspx?AuthID=1399928

In the injection disposal well permit for Sedat #3A, Sedat #1A was identified as a necessary monitoring well to ensure that Sedat #3A was properly functioning, but this well has not been inspected since November 13, 2020, which was the well's first inspection since it was plugged in May of 2020 after being granted a transfer of use permit.

The inspection history of monitoring well Sedat #1A can be viewed here:

http://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleSite.aspx?SiteID=5980

Given the previously mentioned violations and DEP's sporadic and infrequent inspection schedule, DEP clearly does not have the resources to ensure that Penneco's injection disposal well and monitoring well at this site are properly functioning. I urge the EPA to deny this permit application.

Sincerely,

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